

# Privacy Notice- Students, Parents and Applicants

This privacy notice will be subject to regular review and will be updated to reflect changes in the collection or use of personal information.

## How we use your personal information

This privacy notice explains how we collect, use and process your personal data. This includes data you provide and data we acquire by having you as an applicant, student or parent.

Your privacy is important to us and we are committed to protecting and safeguarding your data privacy rights.

## Why we collect personal data

We use your personal information to support your application, once you become a student and to support your learning. Beyond this, other reasons include:

- To keep students and parents/carers informed
- To safeguard students' welfare and provide appropriate pastoral and medical care
- To provide education services (including SEN), careers services and extracurricular activities
- To administer the free school meal provision
- To administer visits and activities
- To meet our legal and statutory duties and responsibilities
- To demonstrate student eligibility for and obtain government funding
- To monitor and report on student progress
- To carry out planning and forecasting, research, and statistical analysis
- To support student learning
- To provide appropriate pastoral care
- To enable students to take part in national or other assessments
- To support students through the higher education application process
- To create and/or maintain students' personal learning records
- To provide access to student services such as online payments
- To enable local authorities and schools to carry out their obligations regarding student tracking and reporting
- For referencing purposes
- For the administration of enquiries and complaints.

## Legal basis for processing

The General Data Protection Regulation allows us to collect and use student information with consent of the data subject, where we are complying with a legal requirement, where processing is necessary to protect the vital interests of a data subject or another person

and where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. When the personal information is Special Category Information we may rely on processing being in the substantial public interest in addition to consent of the data subject and the vital interests of the data subject or another.

Our requirement for this data and our legal basis for processing this data includes the Education Act 1996, 2002 and 2011, The Children Act 1989 and 2004, Education and Skills Act 2008, Schools Standards and Framework Act 1998 and the Equalities Act 2010. We consider the processing of your personal data to be either:

- Necessary for the performance of tasks we carry out in the public interest e.g. education
- Necessary for the performance of our contractual obligations with you e.g. in order to have an applicant/ student
- Necessary for compliance with a legal obligation
- Necessary for the pursuit of the legitimate interests of the school.

If we require your consent for any specific use of your personal information, we will collect it at the appropriate time and you can withdraw this consent at any time by contacting Reception.

### **The personal data we hold**

The categories of data that we collect and process are listed below. Please note the data we collect and process may change based on school requirements during any given academic year.

- Data to identify you and document your characteristics
- Contact details stating where you live and how to contact you and your parents/ guardians
- Admissions information to enable us to administer the application process
- Prior attainment information from a previous school and data relating to your academic progress, exams and attainment at Sandhurst School
- Data for the administration of exams
- Attendance and absence data
- Behavioural data including detentions and exclusions
- Learning difficulties and disabilities, support records, assessments and exam access arrangements
- Medical conditions and details of medical care or advice given
- Child protection, welfare and safeguarding information
- Income and income support, eligibility and use of free school meals
- Your consent preferences where applicable
- Data needed to make/ receive payments and record transactions
- CCTV footage and internet usage logs
- Accident records

- Data for the administration of visits and activities.

### **Special Category Data**

Certain types of student data are more sensitive and require more protection:

- Genetics (sex)
- Ethnicity
- Health (medical, special educational needs and welfare).

We process this data because there is substantial public interest for us to do so.

As an official public authority we are permitted to ask you about unspent relevant criminal convictions in order to meet our safeguarding obligations.

### **Where we collect personal data from**

We collect data from:

- Applications to Sandhurst School
- Pre-enrolment, enrolment and induction process
- Your interactions with the Sandhurst School through our systems, in person or through letters, emails, forms, surveys or phone calls
- Financial transaction
- Third party service providers and government agencies (data processors and controllers listed in “who we share your information with”).
- Other schools

### **Who we share your personal data with**

We do not share personal information with anyone without consent unless the law and our policies allow us to do so. We share students’ data with the Department for Education (DfE) on a statutory basis.

We are required to share information about our students with our local authority (LA) and the Department for Education (DfE) under section 3 of The Education (Information About Individual Students) (England) Regulations 2013.

### **Data collection requirements**

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

### **Sending data outside of the EEA**

Google is an international organisation and in order to provide students with access to Google services your data may end up being transferred to a data centre outside of the EEA. Google's privacy policy can be found here: <https://privacy.google.com/intl/en-GB/index.html>

Other service providers used by the school may also transfer or store data outside of the EEA. In such cases, it will only be where the destination country has been declared by the European Commission as having adequate levels of protection or where adequate and appropriate safeguards are in place.

### **If you choose not to give personal data**

In most cases you will be required to provide the personal data requested, however, there will be some occasions when it is optional.

If you choose not to give us necessary personal data, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services needed to provide you with a government funded education. It could mean that we are unable to offer a student a place to study here or to continue to provide an education. It may also mean that we are unable to provide you with information relating to your son or daughter's education.

### **How we safeguard your personal data**

We care about protecting your data. That's why we have in place a range of appropriate technical and organisational measures that are designed to prevent unauthorised access to, and misuse of, your personal data. These include measures to deal with any suspected data breach.

If you suspect any misuse of, loss of, or unauthorised access to your personal data please let us know immediately.

### **How long we keep your personal data**

We will keep your data for as long as is legally required as set out in our Retention Policy.

Applicant/ student records will be securely destroyed once the retention period has expired. The retention schedule is published as part of our Data Protection Policy. Paper records will be securely destroyed onsite or via a confidential waste disposal company.

### **What rights you have over your personal data**

The law gives you a number of rights in relation to your personal data including:

- The right to access the personal information we have about you

- The right to get us to correct personal data that is wrong or incomplete
- In certain circumstances, the right to ask us to stop using or to delete your personal data
- The right to receive your personal data in an easily re-usable format when it's processed on certain grounds, such as consent or for contractual reasons.

You also ask us to pass this information on to another organisation. You can object to us keeping or using your personal data. This is known as the 'right to object'. You can also ask us to delete, remove or stop using your personal data if there is no need for us to keep it. This is known as the 'right to erasure' or the 'right to be forgotten'. In some situations, we may be able to restrict the use of your data.

There may be legal or other official reasons why we need to keep or use your data but please tell us if you think that we should not be using it.

Further information about your rights can be found on the ICO website:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>.

### **Letting us know if your personal data is incorrect**

You will need to tell us if your information changes, for example your legal name or contact details. Most of your information will be visible through our SIMS Parent Lite App. Some of it can be amended through the SIMS Parent Lite app, otherwise changes must be reported to Reception or on the data check letter that we send out annually.

### **How to get a copy of your personal data**

You have the right to ask us to confirm what data we hold about you at any time: this is known as a subject access request. If we provide you with access to the data we hold about you, we will not charge you for this unless your request is considered manifestly unfounded or excessive. Where we are legally permitted to do so, we may refuse your request, but we will tell you the reasons for doing so.

You can make a subject access request by contacting our Data Protection Officer, [dpo@dataprotection.education](mailto:dpo@dataprotection.education).

### **How to complain**

Please let us know if you are unhappy with how we have used your personal data. Complaints should be made to the Data Protection Officer.

You have the right to lodge a complaint with the Information Commissioner's Office.